

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,
Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,
Defendants.

§
§
§
§
§
§
§

Case No. 5:21-cv-844-XR

**STATE DEFENDANTS' NOTICE OF SUPPLEMENTAL DECLARATIONS IN SUPPORT OF
DEFENDANTS' RESPONSE TO LUPE PLAINTIFFS' MOTION TO COMPEL (ECF No. 650)**

Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State, Angela Colmenero, in her official capacity as Provisional Attorney General of Texas, and the State of Texas ("State Defendants"), hereby submit these Supplemental Declarations in Support of State Defendants' Response to LUPE Plaintiffs' Motion to Compel (ECF No. 650).

At the July 11, 2023 hearing to discuss LUPE Plaintiffs' Motion to Compel Document from State Defendants (ECF No. 630), the Court granted an extension of time through July 14, 2023, for State Defendants to file supplemental affidavits on the matters at issue. Please therefore find as exhibits to this Notice the July 13, 2023 Amended Declaration of Christina Worrell Adkins (Ex. A), the July 14, 2023 Declaration of Jonathan White (Ex. B), and the July 14, 2023 Declaration of Major Wesley Hensley (Ex. C).

Date: July 14, 2023

Respectfully submitted.

ANGELA COLMENERO
Provisional Attorney General

/s/ RYAN G. KERCHER
RYAN G. KERCHER
Deputy Chief, General Litigation Division
Tex. State Bar No. 24060998

BRENT WEBSTER
First Assistant Attorney General

KATHLEEN T. HUNKER
Special Counsel
Tex. State Bar No. 24118415

GRANT DORFMAN
Deputy First Assistant Attorney General

WILLIAM D. WASSDORF
Assistant Attorney General
Tex. State Bar No. 24103022

JAMES LLOYD
Deputy Attorney General for Civil
Litigation

ZACHARY BERG
Special Counsel
Tex. State Bar. 24107706

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2120
Fax: (512) 320-0667
ryan.kercher@oag.texas.gov
kathleen.hunker@oag.texas.gov
will.wassdorf@oag.texas.gov
zachary.berg@oag.texas.gov

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on July 14, 2023, and that all counsel of record were served by CM/ECF.

/s/ RYAN G. KERCHER
RYAN G. KERCHER